

**APPENDIX B**

**COMMENTS TO**

**NOTICE OF PREPARATION**

November 20, 2002

Goodyear K. Walker  
California State Lands Commission  
100 Howe Ave., Suite 100-South  
Sacramento, CA 95825  
Fax: (916) 574-1885  
[Walker@slc.ca.gov](mailto:Walker@slc.ca.gov)

Tom Hurshman  
Bureau of Land Management  
2505 South Townsend Ave.  
Montrose, CO 81401  
Fax: 907 2405367  
[Tom.Hurshman@co.blm.gov](mailto:Tom.Hurshman@co.blm.gov)

dup

**RE: PROJECT DESCRIPTION**  
**El Paso Line No.1903 Pipeline Conversion Project**  
**(State Leases PRC 7527.2 and 6783.1)**  
**CSLC EIR No. 719**  
**BLM Serial No. CACA-42649**  
**CSLC Files: WP6783;W30141**  
**SCH # 2002101069**

My wife and I own two five acre parcels at Banducci and Arosa Roads in Tehachapi, CA and will be building our home there this spring. The pipeline with the proposed changes passes through our parcel and we are adamantly opposed to the changeover to natural gas. I am an industrial engineer and well aware of the possible problems the change would produce.

The 36" pipeline has had numerous leaks in the past. One such leak killed over 10 people. The shutoff valves were in place but did not work, causing a major disaster. They propose to put emergency shutoff valves in the converted pipeline, but their record does not indicate they are responsible enough to keep them 100% operational. A 36" natural gas line would have the potential of a disaster of great proportion. I am told they stopped using the pipeline because it leaked. If this is so, then have they corrected those leaks and cleaned up the contaminated soils as per EPA requirements?

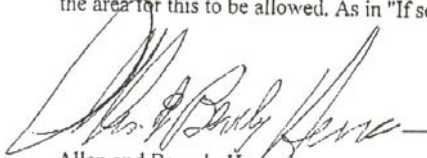
Natural gas is about 1800 times less dense than gasoline. If there were leaks in the past, then the future should hold 1800 times more leaks. Even one leak is unacceptable. There are many homes in this area now, as it has been

The impact and proposed mitigation for a potential gas line leak or rupture is discussed in the *Impacts Analysis and Mitigation* section of *Hazards and Public Safety* (Section 4.6.4).

subdivided since the pipeline was first installed. Any further use as a gasoline or natural gas line should require that it be moved to a remote location where a leak would have less chance for a disaster. With a 36" pipe a major leak may not trigger the emergency shutoff valves, and even then the spacing between the valves would allow a major amount of gas to be released.

If for some reason, that escapes me, it is deemed advisable to allow for the conversion I would suggest that the present 36" pipeline be used as a sleeve and second wall for a plastic pipe that is inserted within. The detectors between the walls could then be set to be much more sensitive to stop even small leaks. The newer plastic pipes are far less prone to leakage. The 36" pipe would also act as a barrier to penetration by accident or earthquakes.

I was in Granada Hills during the 1971 earthquake when a 6" natural gas line burst and it took three days to shut it down. Tehachapi is earthquake prone and could have an earthquake in the magnitude of 7+ on the Richter scale, as demonstrated in the past. Such a repeat would surely rupture this line and perhaps also damage the shutoff valves. There are now far too many people in the area for this to be allowed. As in "If something can go wrong, it will."



Allen and Beverly Herron  
38076 Pine Meadow Lane  
Oakhurst, CA 93644  
(559) 658-8815  
Fax (559) 658-8819  
allen@blackhawkfoundation.org

DEPARTMENT OF TRANSPORTATION  
TRANSPORTATION PLANNING - MS 32  
1120 N STREET  
P.O. BOX 942874  
SACRAMENTO, CA 94274-0001  
Telephone (916) 653-9689  
Fax (916) 653-1447



Post-It® Fax Note	7671	Date	11/13/02	# of pages	2
To	GOODYEAR K. WALKER	From	Bill Costa		
Co/Dep	CA State Lands	Co.	CALTRANS IGR		
Phone #	574-1853	Phone #	653-9689		
Fax #	574-1945	Fax #	653-1447		

November 12, 2002

Mr. Goodyear K. Walker  
California State Lands Commission  
100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825

Subject: The California Department of Transportation's Review of State Clearinghouse #2002101069  
Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the El Paso  
Natural Gas Pipeline 1903 Conversion

Dear Mr. Walker:

Thank you for the opportunity to review this State Clearinghouse notice. The California Department of Transportation (Department) has reviewed this document with the Department's headquarters Division of Transportation Intergovernmental Review (IGR) Program, and the IGR branches in the Department's districts 6 (Fresno) and 8 (San Bernardino) offices. The Department has the following comments:

- Any encroachment into, on or over the Department's right of way will require a Department encroachment permit. Department encroachment permits are discretionary and not ministerial. Timely application for Department encroachment permits must be made to the District Encroachment Permit Engineer having jurisdiction (district jurisdictions are shown on the attached map). Please check with the appropriate district Encroachment Permit Engineering office to determine permit application requirements. Sufficient time must be allowed for the Permit Engineer, district Environmental Branch, and other functional reviewers to analyze and review the project and its potential impacts to the Department's right of way, structures and facilities. These reviews might indicate the need for additional studies and clearances on historical, archaeological, environmental and transportation resources.
- For those construction activities requiring detours, lane closures, parking restrictions, etc., which may disrupt the safe and efficient operation of state facilities, a construction Traffic Management Plan will be required.

If you have any questions regarding these comments or the attachments, call me at (916) 653-9689.

Sincerely,

William J. Costa, Manager  
Intergovernmental Review Program  
Department of Transportation

Attachment

cc: Districts 6 and 8  
Becky Frank, SCH#2002101069

Responses to these comments can be found in the *Impacts Analysis and Mitigation* section of *Traffic and Transportation* (Section 4.8.4).

HQ Transportation Planning  
P.O. Box 942874  
Sacramento, CA 94274-0001 \*  
Phone: 916-653-1637

### Caltrans Planning Contacts

District 1  
1656 Union Street  
P.O. Box 3770  
Eureka, CA 95502-3770 \*  
Phone: (707) 445-6333

District 4  
P.O. Box 23660  
Oakland, CA 94623-0660 \*  
Phone: (510) 285-6196

District 7  
120 South Spring Street  
Los Angeles, CA 90012  
Phone: (213) 897-4279

District 10  
1976 East Charter Way  
P.O. Box 2048  
Stockton, CA 95201  
Phone: (209) 948-7906

District 2  
1657 Riverside Drive  
P.O. Box 496073  
Redding, CA 96049-6073  
Phone: (530) 225-3484

District 5  
San Luis Obispo,  
CA 93401-5415\*  
Phone: (805) 549-3130

District 8  
464 West Fourth Street  
San Bernardino, CA 92401  
Phone: (909) 383-4147

District 11  
2829 Juan Street  
San Diego, CA 92186-5406 \*  
Phone: (619) 688-6460

District 3  
703 B Street  
P.O. Box 911  
Marysville, CA 95901 \*  
Phone: (530) 741-4277

District 6  
1352 West Olive Avenue  
P.O. Box 12616  
Phone: (559) 488-4260

District 9  
500 South Main Street  
Bishop, CA 93514  
Phone: (760) 872-0691

District 12  
3337 Michelson Dr., #380  
Irvine, CA 92612-3894  
Phone: (949) 724-2255

\* Zip code for P.O. Box

### DISTRICT BOUNDARIES AND MAILING ADDRESSES

PREPARED BY  
DIVISION OF TRANSPORTATION  
PLANNING



State of California  
Business, Transportation and Housing Agency  
Department of Transportation

JEFF MORALES  
Director  
California Department of Transportation  
1120 N Street  
P.O. Box 942874  
Sacramento, CA 94274-0001 \*  
Phone: (916) 654-2852



November 8, 2002

Goodyear K. Walker  
California State Lands Commission  
100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825

RE: Notice of Intent/Preparation – Joint EIR/EA – El Paso Line No. 3 Conversion Project

Dear Mr. Walker:

Thank you for the opportunity to review the above-noted document. As an affected agency, the City of Barstow would like to provide the following comments for consideration:

1. The Project Location map provided is at a scale that makes it difficult to determine the specific location of the pipeline as it runs through the City of Barstow. Many pipelines run through and near the City, some of which affect the City more than others. It would be helpful to provide a detailed route map with which the project can be assessed. Once the affected pipeline's specific location/alignment is identified, additional comments may be forthcoming;
2. Under Section 6.1.1 (Hazards and Hazardous Materials/Risk of Upset), the analysis should thoroughly compare the impact risk from operating a 30" pipeline that previously transported crude oil with the same pipeline carrying natural gas that would appear to be less stable and have a higher risk of explosion. The NOI's current statement that, "(O)peration of a natural gas pipeline includes a small but measurable risk of upset..." appears to understate this potential impact. A similar pipeline located in Cajon Pass (sixty miles south of Barstow) operated by Cal-Nev ruptured a number of years ago, causing major upset to the adjacent freeway and communities. The resulting analysis should be evaluated by safety and emergency response agencies serving the City.

Thank you for your consideration in this matter. I look forward to reviewing the draft document when it is distributed. Should you have any questions regarding these comments, please do not hesitate to contact me at (760) 256-3531 extension 3225.

Very Truly Yours,

Scott Priester, AICP  
Community Development Director/City Planner

cc: Paul Warner, City Manager  
Ken Becknell, Chief of Police  
Tom Hurshman, Bureau of Land Management

C:\Correspondence\BLM\ElPaso\PipelineNOI.doc

A detailed project location map was sent to Scott Priester of City of Barstow Planning Department.

An analysis of the risks associated with the operation of a gas pipeline is included in the *Impacts Analysis and Mitigation* section of *Hazards and Public Safety* (Section 4.6.4).





**COUNTY OF RIVERSIDE**  
**TRANSPORTATION AND**  
**LAND MANAGEMENT AGENCY**  
**Transportation Department**



George A. Johnson, P.E.  
Director of Transportation

November 12, 2002

Goodyear K. Walker  
California State Lands Commission  
100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825

SUBJECT: Notice of Intent/Preparation to Prepare a Joint Environmental Impact Report/Environmental Assessment (EIR/EA) for the Proposed El Paso Line No. 1903 Pipeline Conversion Project

Dear Mr. Walker:

The County of Riverside Transportation Department has reviewed the above referenced document and we have the comments noted below.

It appears that the pipeline is in close proximity to, or crosses roadways that are under the jurisdiction of the County of Riverside. If it is determined that the pipeline traverses into any rights-of-way within County jurisdiction, encroachment permits will be required through our Department.

We look forward to receiving the EIR/EA when available for our further review and comment. If you have questions, or desire clarification of our comments, please contact Sian Roman, Planner III, at (909) 955-6874.

Sincerely,

Edwin D. Studor  
Administrative Manager

The response to this comment can be found in the *Impacts Analysis and Mitigation* section of *Traffic and Transportation* (Section 4.8.4).

## LAND USE SERVICES DEPARTMENT



COUNTY OF SAN BERNARDINO  
ECONOMIC DEVELOPMENT  
AND PUBLIC SERVICES GROUP

### PLANNING DIVISION

385 North Arrowhead Avenue • San Bernardino, CA 92415-0182 • (909) 387-4131  
Current Planning Fax (909) 387-3249 • Advance Planning Fax (909) 387-3223  
15505 Civic Drive • Victorville, CA 92392 • (760) 243-8245 • Fax (760) 243-8212  
<http://www.sbcounty.gov/landuseservices>

MICHAEL E. HAYS  
Director of Land Use Services

December 3, 2002

Mr. Goodyear Walker  
California State Lands Commission  
100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825

RE: CONVERSION OF AN EXISTING PIPELINE FROM CRUDE OIL TRANSPORT  
TO NATURAL GAS TRANSPORT (STATE LEASES PRC 7527.2 AND 6783.1)

Dear Mr. Walker:

This letter is sent in response to the Notice of Intent/Preparation to prepare a joint Environmental Impact Report regarding the conversion of an existing pipeline from crude oil transport to natural gas transport.

Our concern would be the impact of the pipeline on the Desert Tortoise and Mojave Ground Squirrel habitat. These issues should be addressed in the Environmental Impact Report (EIR). Once completed, please forward a copy of the EIR to our agency for review.

Sincerely,

Patrick Egle, Planner  
Advance Planning Division

PE:dja

Project impacts related to Desert Tortoise and Mojave Ground Squirrel habitat are included in the *Impact Analysis and Mitigation* section of *Biological Resources* (Section 4.2.4). A copy of the DEIR will be sent to San Bernardino County Planning Department for review and comment.